

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: : Case No. 17-52498
Juakita Bowens : Chapter 13
Debtor : Judge John E. Hoffman, Jr.

DEBTOR'S MOTION TO MODIFY POST-CONFIRMATION

Debtor, by and through counsel, hereby moves to modify her Chapter 13 plan. Debtor respectfully requests that the modification be granted for reasons more fully set forth in the Memorandum below.

Respectfully submitted,

/s/ W. Mark Jump
W. Mark Jump (0062837)
Attorney for Debtor(s)
2130 Arlington Avenue
Columbus, OH 43221
(614) 481-4480 (telephone)
(866)334.2208 (facsimile)
bankruptcycourt@jumplegal.com

MEMORANDUM IN SUPPORT

On January 26, 2018, Debtor's Chapter 13 plan was confirmed. Pursuant to the Debtor's Chapter 13 plan, Debtor was required to make payments of \$2,500.00 per month for twenty four (24) months, and then increase to \$2,610.00 per month for the remainder of the plan. The unsecured dividend is one hundred percent (100%).

Debtor's plan is projecting to longer than the maximum sixty (60) months in violation of 11 U.S.C. § 1322(d) due to mortgage payment changes. Therefore, Debtor would like to increase her plan payment to \$3,000.00 for the remainder of the plan beginning in July, 2018. The dividend paid to unsecured creditors shall remain one hundred percent (100%). This modified plan projects to complete within the next forty five (45) months.

The proposed modification will not modify the rights of the holders of unsecured claims. The proposed modification will not modify the rights of any secured claim holder.

The proposed modified plan is attached hereto and a copy of the same, together with a copy of this Motion and Memorandum of Support has been sent to the Chapter 13 Trustee, US Trustee, and holders of all claims.

WHEREFORE, the Debtor prays she be permitted to amend the plan to conform to the attached amended plan pursuant to 11 USC Section 1329.

/s/ W. Mark Jump
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AMENDMENT TO CONFIRMED CHAPTER 13 PLAN

Now comes the Debtor herein, to amend the plan to state:

Debtor's plan payment shall increase to \$3,000.00 per month for the remainder of the plan beginning in July, 2018. The general unsecured dividend shall remain one hundred percent (100%).

Dated: July 25, 2018

**/s/ W. Mark Jump
Attorney for Debtors**

Debtor's Verification

I declare under penalty of perjury that I have read the attached amendments and that they are true and correct to the best of my knowledge, information or belief.

Date: July 25, 2018

/s/
Juakita Bowens

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In re: : Case No. 17-52498

Juakita Bowens : Chapter 13

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NOTICE OF MOTION/OBJECTION

The Debtor has filed papers with the Court to modify her plan. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief sought in the motion/objection, then on or **before twenty-one (21) days from the date set forth in the certificate of service for the motion/objection**, you must file with the court a response explaining your position by mailing your response by ordinary U.S. Mail to 170 North High St., Columbus, OH 43215, or your attorney must file a response using the court's ECF System.

The court must **receive** your response on or before the above date.

You must also send a copy of your response either by 1) the court's ECF System or by 2) ordinary U.S. Mail to;

W. Mark Jump, 2130 Arlington Ave, Columbus, OH 43221

Faye D. English, Chapter 13 Trustee, 10 West Broad Street, Suite 900, Columbus, Ohio 43215-3449

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion/objection and may enter an order granting that relief without further notice or hearing.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Modify was served (i) **electronically** on July 25, 2018 through the Court's ECF System on all ECF participants registered in this case at the email address registered with the court and (ii) by **ordinary U.S. mail** on July 25, 2018 addressed to:

See Attached Creditor Matrix

/s/ W. Mark Jump
W. Mark Jump

Label Matrix for local noticing
0648-2
Case 2:17-bk-52498
Southern District of Ohio
Columbus
Wed Jul 25 09:12:26 EDT 2018

Educational Credit Management Corporation
P.O. Box 16408
St Paul, MN 55116-0408

Exeter Finance Corporation
P.O. BOX 165028
IRVING, TX 75016-5028

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

AES/SLM Trust
PO BOX 61047
Harrisburg, PA 17106-1047

AT&T
c/o ERC
PO BOX 57547
Jacksonville, FL 32241-7547

Acceptance Now
5501 Headquarters Drive
Plano, TX 75024-5837

Asst US Trustee (Col)
Office of the US Trustee
170 North High Street
Suite 200
Columbus, OH 43215-2417

Attn: Exeter Finance Corp. Department
Ascension Capital Group
Account: XXXXX1477
P.O. Box 165028
Irving, TX 75016-5028

Capital One
PO BOX 30285
Salt Lake City, UT 84130-0285

Cavalry SPV I, LLC
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595-2321

(p)COLUMBIA GAS
290 W NATIONWIDE BLVD 5TH FL
BANKRUPTCY DEPARTMENT
COLUMBUS OH 43215-4157

Columbia Gas of Ohio
c/o Online Collections
PO BOX 1489
Winterville, NC 28590-1489

Exeter Finance
Po Box 166097
Irving, TX 75016-6097

Exeter Finance LLC
PO Box 167399
Irving TX 75016-7399

First Premier Bank
601 S. Minnesota Ave.
Sioux Falls, SD 57104-4868

Great Lakes Higher Education
PO BOX 7860
Madison, WI 53707-7860

PHEAA
PO Box 8147
Harrisburg, PA 17105-8147

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Penny Mac
PO BOX 514387
Los Angeles, CA 90051-4387

PennyMac Loan Services, LLC
6101 Condor Drive, Suite 200
Moorpark CA 93021-2602

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Premier Bankcard, Llc
c o Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-7999

Sprint
c/o Convergent Outsourcing
800 SW 39th St.
Renton, WA 98057-4975

Synchrony Bank
c/o Cavalry Portfolio
500 Summit Lake Dr.
Valhalla, NY 10595-1340

The Huntington National Bank
PO Box 89424
Cleveland, OH 44101-6424

US DEPT OF EDUCATION
CLAIMS FILING UNIT
PO BOX 8973
MADISON WI 53708-8973

Faye D. English
Chapter 13 Trustee
10 West Broad Street
Suite 900
Columbus, OH 43215-3449

Juakita Bowens
7940 Harvestmoon Dr.
Reynoldsburg, OH 43068-8133

W Mark Jump
2130 Arlington Avenue
Columbus, OH 43221-4314

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Columbia Gas of Ohio
P.O. Box 117
Columbus, OH 43216

Portfolio Recovery Associates, LLC
POB 41067
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)PennyMac Loan Services, LLC	(d)Educational Credit Management Corporation	End of Label Matrix	
	po box 16408	Mailable recipients	29
	St. Paul, MN 55116-0408	Bypassed recipients	2
		Total	31